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December 11, 2001

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Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Part 25 Streamlining Proceeding, IB Docket 00-248

NOTICE OF EX PARTE PRESENTATION

Dear Ms. Salas:

On Monday, November 19, 2001, the undersigned, Joslyn Read and John Stein of Hughes Electronics Corporation d/b/a Hughes Network Systems, John Stern and Young Lee of Loral Space and Communications LTD, Donna Bethea and Harry Ng of PanAmSat Corporation, Joe Godles of Goldberg, Godles, Wiener and Wright, Paul Holland of Starband Communications Inc., Kimberly Baum of ASTROLINK International LLC, and Jaime Londono of SES Americom (formerly GE American Communications, Inc.) met with Thomas Tycz, Ron Repasi, Jennifer Gilsenan, Fern Jarmulnek, Steven Spaeth, Chris Murphy, and Sylvia Lam of the International Bureau. The topic of discussion was the *ex parte* submission of the Satellite Industry Association, concerning proposed revisions of the Part 25 rules, that was filed on November 5, 2001 in this docket. The industry group also presented the attached Overview of Major Proposed Revisions of the Satellite Industry Association. A copy of this letter with the attachment will be provided to each of the members of the International Bureau identified above.

The Satellite Industry Association regrets the inadvertent oversight in the late filing of this Notice of Ex Parte Presentation.

Respectfully submitted,

/s/ Dori K. Bailey

Dori K. Bailey
of LATHAM & WATKINS

Enclosure

November 19, 2001
Final Version

Overview of Major Proposed Revisions of the Satellite Industry Association
Part 25 Streamlining Proceeding
IB Docket No. 00-248

A. Proposed Uplink Power Spectral Density Levels

- The maximum uplink power spectral density is modified as –14.0 + X – 10log(N)dB(W/4kHz) for routine processing of VSAT applications in the 14 GHz band.

  - For antennas with dimensions less than 1.8 meters in the GSO plane, X is a value from 0 to 2 dB, which corresponds to the improved level of the antenna sidelobe performance as defined in proposed Section 25.134(a)(2). This formulation permits such antennas that meet this improved antenna sidelobe performance to increase transmit power by up to an additional 2 dB.[1] Antennas that meet these specifications will receive an ALSAT designation.

  - For all other antennas, X is equal to zero, and the use of this power spectral density is associated with the applicable antenna patterns in Section 25.209.[2] Section C below describes which of these antennas will receive an ALSAT designation.

B. Proposed Downlink EIRP Spectral Density Levels

- The maximum downlink EIRP spectral density is increased to 9dB(W/4kHz) for routine processing of both VSAT and individual earth station applications in the 12/14 GHz band.[3] These antennas will receive an ALSAT designation.

- The maximum downlink EIRP spectral density may be further increased to 13dB(W/4kHz) for routine processing of both VSAT and individual earth station applications in the 12/14 GHz band provided that such power level is coordinated with adjacent satellites.[4] These antennas will not receive an ALSAT designation.

C. Proposed Antenna Performance Standards

- The antenna performance standards for small antennas operating in the 14 GHz band are modified to start as follows:[5]

  - For antennas with dimensions from 1.2 to less than 1.8 meters in the GSO plane, the standards start at 1.25 degrees, and in all other directions outside the main beam

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1 *See* proposed Section 25.134 (a)(1), (a)(2).

2 *See* proposed Sections 25.134(a)(1), (a)(5), 25.212(c)(ii), 25.209(a), (g)(1).

3 *See* proposed Sections 25.134(a)(3), 25.212(c)(ii)(1).

4 *See* proposed Sections 25.134(a)(4), 25.212(c)(ii)(2).

5 *See* proposed Section 25.209(g)(1)(i)

(non-GSO plane), the standards start at 3.0 degrees. These antennas will receive an ALSAT designation.

- For antennas with dimensions less than 1.2 meters in the GSO plane, the standards start at 1.5 degrees, and in all other directions outside the main beam (non-GSO plane), the standards start at 3.0 degrees. These antennas also will receive an ALSAT designation.

- For antennas with dimensions less than 1.2 meters in the GSO plane, the standards start at up to 1.8 degrees provided written confirmation has been obtained indicating that the antenna has been coordinated with adjacent satellites within 3 degrees. These antennas will not receive an ALSAT designation.

- In frequency bands between 11.7 and 30 GHz not shared on a co-primary basis with terrestrial services, the antenna gain envelope for antennas with dimensions of 1.8 meters or less in the GSO plane at angles from 85 degrees to 180 degrees from the axis of the main lobe shall lie below 0 dBi.[6]

- Small antennas operating in the 12 GHz band with dimensions less than 1.8 meters in the GSO plane shall be deemed to meet the receive antenna performance standards of Sections 25.209(a) and (g)(1)(ii) for purposes of determining whether such antennas qualify for routine processing, as long as such antennas meet such standards starting at 2 degrees in the GSO plane.[7]

D. Receive Protection

- Protection for the receive portion of all antennas will be provided to the extent specified in Section 25.209(c).[8]

- The reference pattern in Section 25.209(c) is modified to start at 1.25 degrees for antennas in the 12 GHz band with dimensions of less than 1.8 meters in the GSO plane.[9]

E. Non-Conforming Transmit Earth Station Operations

- Section 25.220 is proposed to be limited to non-conforming transmit earth station operations in the C and Ku-bands.[10]

- Non-conforming transmit antennas must be coordinated with adjacent satellites.[11]

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6 *See* proposed Section 25.209(g)(1)(ii).

7 *See* proposed Sections 25.209(g)(2), 25.220(a)(1).

8 *See* proposed Sections 25.209(c), (g)(2), 25.220(a)(1).

9 *See* proposed Section 25.209(c).

10 *See* proposed Section 25.220.

- Non-conforming transmit power spectral density levels also must be coordinated with adjacent satellites.[12]

F. Antenna Verification

- Section 25.132 is modified to take into account the Ka-band rules in Section 25.138.[13]

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[11] *See* proposed Section 25.220(c), (d).

[12] *See* proposed Section 25.220(d).

[13] *See* proposed Section 25.132.